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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**SUPPLEMENTAL SUBMISSION IN
RESPONSE TO QUESTION 7 IN
FOLLOW-UP QUESTIONS RE DIXIE
AND FLY FIRES**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this further submission in response to Question 7 in the Court’s August 17, 2021 order (Dkt. 1417).

Question 7:

Please provide copies of all reports and memos and emails regarding the site visit on April 16, 2021, regarding the plan for under-grounding the circuit and all reports and memos and emails summarizing, describing or referring to the need to do so or the proposal to do so or the problem leading to such proposals.

PG&E Supplemental Response:

Consistent with PG&E’s August 31, 2021 submission, PG&E delivered to the Court on August 31, 2021 and September 3, 2021 two thumb drives containing electronic copies of 4,098 documents bearing Bates PGE-DIXIE-NDCAL-0000001 to PGE-DIXIE-NDCAL-000017010 that PG&E has identified as responsive to this request.¹ On September 16, 2021, PG&E will deliver to the Court a third thumb drive containing electronic copies of an additional 608 documents bearing Bates PGE-DIXIE-NDCAL-000017011 to PGE-DIXIE-NDCAL-000018125 that PG&E has identified as responsive to this request.

As set forth in the August 31, 2021 submission, PG&E identified a list of thirteen custodians (“Custodians”) likely to have emails responsive to this question, including individuals involved with the 2021 Wildfire Distribution Risk Model; individuals involved in the development, presentation, and management of the Bucks Creek 1101 distribution circuit approved by the Wildfire Risk Governance Steering Committee in January 2021 (the “Bucks Creek 1101 System Hardening Project”); and individuals who attended the April 16, 2021 site visit related to the Bucks Creek 1101 System Hardening Project. PG&E has determined that the Custodians’ Outlook calendar appointments had not been separately collected. PG&E has since collected 1,859 of the Custodians’ Outlook calendar appointments (approximately 23,500 total documents including attachments) for meetings between October 1, 2020 and July 13, 2021 that contain the search term “Buck* W/5

¹ As set forth in PG&E’s August 31, 2021 submission, PG&E does not interpret the Court’s question as calling for information protected by the attorney-client privilege or attorney work product protection.

Creek” in the subject or text of the Outlook calendar appointment or in any attachment thereto. From that collection, to supplement its prior production of emails in response to this request, PG&E is producing to the Court the 354 of these Outlook calendar appointments (608 total documents including attachments) that contain the search term “Buck* W/5 Creek” in the subject or text of the Outlook calendar appointment itself, as opposed to only containing the search term in an attachment. Where applicable, PG&E is redacting portions of documents determined to be protected by attorney-client privilege or to constitute attorney work product.

As set forth in PG&E’s August 31, 2021 submission, certain documents being provided to the Court contain personally identifying information and other confidential information. PG&E is in the process of identifying this confidential information and will prepare and deliver a redacted set and file a corresponding administrative motion to seal.

Dated: September 16, 2021

Respectfully Submitted,

JENNER & BLOCK LLP

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